

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FREDERICK J. GREDE, not individually but as)	
Liquidation Trustee of the Sentinel Liquidation)	
Trust,)	
)	Honorable Rebecca R. Pallmeyer
Plaintiff,)	
v.)	
)	Case No. 09-cv-00140
CROSSLAND LLC,)	
)	
Defendant.)	

**CROSSLAND LLC’S MOTION FOR ENTRY OF JUDGMENT ON
COUNTS I THROUGH V OF THE TRUSTEE’S SECOND AMENDED COMPLAINT**

Defendant, Crossland LLC (“Crossland”), respectfully submits this Motion for Entry of Judgment on Counts I through V of the Trustee’s Second Amended Complaint. Specifically, Crossland seeks an Order from the Court: (1) entering judgment in Crossland’s favor and against the Trustee on Counts I through V of the Trustee’s Second Amended Complaint; (2) directing the Trustee to pay Crossland its pro rata share of the SEG 1 Reserve and the Section 7.20(b) Disputed Claims Reserve within seven days of this Court’s entry of judgment on Count III; and (3) granting all other just relief.

A Memorandum of Law has been submitted herewith.

Accordingly, in view of the arguments in the accompanying memorandum, Crossland respectfully requests that the Court GRANT its Motion for Entry of Judgment on Counts I through V of the Trustee’s Second Amended Complaint.

Dated: October 13, 2017

Respectfully submitted,

CROSSLAND LLC

By: /s/ Geoffrey S. Goodman

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CERTIFICATE OF SERVICE

I, Peter J. O'Meara, an attorney, hereby certify that on October 13, 2017, I electronically filed the foregoing **CROSSLAND LLC'S MOTION FOR ENTRY OF JUDGMENT ON COUNTS I, II, IV and V** with the Clerk of the Court using the CM/ECF system, which caused the same to be served on all counsel of record via ECF filing.

By: /s/ Peter J. O'Meara
One of its attorneys